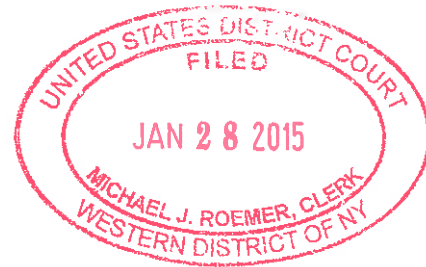


**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NEW YORK**

Jonathan Paul Catlin
and
Charity Renee Catlin
Plaintiffs

vs.

Global Recovery Group, Inc.
Defendant



CASE NO. 14-CV-6324DGL

PLAINTIFFS' RULE 26(a)(1) INITIAL DISCLOSURES

Pursuant to Fed. R. Civ. 26(a)(1), Plaintiffs makes the following disclosures based on the information currently and reasonably available to Plaintiffs:

A. Individuals Likely to Have Discoverable Information Supporting Plaintiff's Claims

Knowledge of the allegations and claimed damages set forth in the Complaint

1. Jonathan Paul Catlin
PO Box 621
Naples, New York 14512
(208) 627-3950

2. Charity Catlin
PO Box 621
Naples, New York 14512
(208) 627-3950

Plaintiffs reserve the right to supplement and amend this listing.

B. Documents Plaintiff May Use to Support His Claims

1. Unrebutted affidavit of Charity Renee Catlin describing the events of June 13, 2013, including her contact with a said Karen Williams and a phone representative of Global (See Exhibit A of the First Amended Complaint).

2. Unrebutted affidavit of Jonathan Paul Catlin describing the events of June 13, 2013 and his phone conversation with "Jason", a phone representative of Global (See Exhibit B of the First Amended Complaint).

3. Photograph of Charity Catlin's phone showing the incoming call from the woman identifying herself as "Karen Williams"

4. Recording of Jonathan Catlin's phone conversation with "Jason" of Global.

5. Handwritten notes from Charity Catlin's conversation with "Karen Williams" and Jonathan Catlin's conversation with "Jason."

7. Bill of particulars detailing Plaintiff's actual damages resulting from Defendant's violations of 15 USC § 1692 (See attached).

Plaintiffs reserve the right to supplement and amend this listing.

C. Damages

Plaintiffs seek \$1,500.00 in statutory damages for each violation of the Telephone Consumer Protection Act (47 USC § 227); the total number of violations is unknown at this time and can be accurately determined only through the discovery process.

Plaintiffs seek \$1000.00 in statutory damages for violations of the Fair Debt Collection Practices Act (15 USC § 1692) by Global Recovery Group, Inc.

Plaintiffs seek \$1000.00 in statutory damages for violations of the Fair Debt Collection Practices Act (15 USC § 1692) by the woman who identified herself as "Karen Williams."

1 Plaintiffs seek \$10,000.00 in actual damages for violations of the Fair Debt Collection Practices
2 Act (15 USC § 1692). Actual damages are detailed in Bill of Particulars (as attached).

3
4 Plaintiffs seek punitive damages as would seem just and right to the court.

5
6 Plaintiffs seek reasonable attorneys fees & costs, along with costs of suit.

7
8 Plaintiffs seek reasonable costs of time to pursue suit.

9
10 Plaintiffs seek such other relief as the court may find to be just and proper.

11
12 Plaintiffs reserve the right to supplement and amend this listing.

13
14 **D. Insurance**

15
16 NA

17
18
19 DATED this 25th day of January, 2015.

20
21
22 Respectfully submitted,

23
24 /s/ Jonathan Paul Catlin

25 Jonathan Paul Catlin

26
27 /s/ Charity Renee Catlin

28 Charity Renee Catlin

29
30 c/o PO Box 621

31 Naples, New York

32 cell: 208-627-3950

33 e-mail: myfriendstenthousand@gmail.com

34
35 *In Proper Person*

Bill of Particulars

Loss of quality family time	\$1,250.00
Disruption of family life	\$1,250.00
Harassment	\$1,000.00
Loss of sleep	\$500.00
Time and energy expended over a week by both plaintiffs watching for the fictitious process server and calling Global	\$1,000.00
At least 3 man-days spent looking for information on the true identity of "Global"	\$1,500.00
Stress	\$1,000.00
Agitation	\$1,000.00
Anxiety	\$500.00
Frustration	\$1,000.00
Total	\$10,000.00

CERTIFICATE OF SERVICE

I certify that on this 25th day of January, 2015, a true and correct copy of the foregoing Plaintiff's Rule 26(a)(1) Mandatory Initial Disclosures is served by electronic mail on the counsels for the defense at the addresses described below. Paper copies will also be mailed to the addresses below on January 26, 2015.

Brandon Wrazen, Esq.
Email: brandonwrazen@peltanlaw.com
Peltan Law, PLLC
1207 Delaware Ave., Suite 206
Buffalo, NY 14209

David G. Peltan
Email: davidpeltan@peltanlaw.com
David Peltan, Esq.
Peltan Law, PLLC
128 Church Street
East Aurora, NY 14052
(716) 655-3887 office
(716) 374-5431 mobile

/s/ Jonathan Paul Catlin
Jonathan Paul Catlin

/s/ Charity Renee Catlin
Charity Renee Catlin

Plaintiffs *Pro Se*
Post Office Box 621
Naples, New York 14512
Cell: (208) 627-3950
Email: myfriendstenthousand@gmail.com